

# Exhibit ‘B’



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**December 12, 2022**

**VIA Email**

J. David Apple  
Apple & Fink, LLP  
735 Plaza Blvd.  
Suite 200  
Coppell, TX  
75019

**Re: Deficient Production Pursuant to Joint Advisory - *Melody Joy Cantu and Dr. Rodrigo Cantu v. Dr. Sandra Guerra and Digital Forensics Corporation, LLC* - Case No. 5:20-CV-0746 (JKP)**

Dear Mr. Apple,

The supplemental discovery you produced to our firm on November 11<sup>th</sup>, 2022, is unsatisfactory. You have withheld a substantial portion of the requested discovery, despite agreeing to produce pursuant to the Joint Advisory. Section 3(a) of the Joint Advisory outlines your obligations under our agreement:

**3(a) With respect to Plaintiffs Melody Joy Cantu's and Dr. Rodrigo Cantu's Motion to Compel [Doc. 103]:**

a. Counsel for Plaintiffs shall send counsel for DFC a list of the specific documents Plaintiffs contend DFC has not produced per Plaintiffs' Motion to Compel [103]. Upon receipt of such list from Plaintiffs' counsel, counsel for DFC will confer with DFC and, no later than November 11, 2022, either:

- (i) confirm in writing to Plaintiffs that such documents been produced;
- (ii) confirm such documents do not exist; or
- (iii) supplement DFC's production if needed.

In your supplemental production, you repeatedly justify non-compliance by stating that "This information was not previously requested from DFC by Plaintiffs and is thus, outside the scope of Joint Advisory." The Joint Advisory was agreed upon with the understanding that you would respond with supplemental discovery conforming to §§ 3(a) i-iii of the Joint Advisory. It was only upon agreement to this that we withdrew our Motion for Sanctions.



If you do not produce complete discovery pursuant to the Joint Advisory by COB Friday, December 16<sup>th</sup>, we will seek relief from the Court.

We look forward to receiving acceptable production from you by the end of the week.

Sincerely,

/s/ Michael Hassard

Michael Hassard

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